

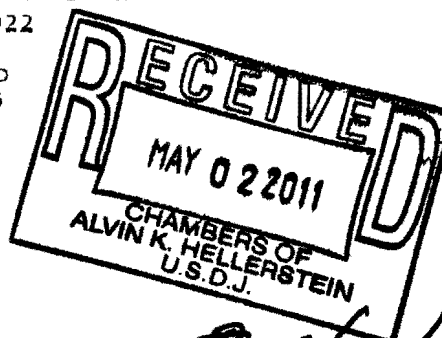
# KM&M

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April 28, 2011

VIA FACSIMILE (212) 805-7942

Hon. Alvin K. Hellerstein  
United States District Judge  
Southern District of New York  
United States District Courthouse  
500 Pearl Street, Room 1050  
New York, New York 10007

*Agreed 8 & 6/1/11, at  
10<sup>00</sup> a.m. no further  
agreements - 5/2/11  
Alvin K. Hellerstein*

Re: Rojas, et al. v. World Yacht Inc., et al. (10-cv-6286)  
KM&M File No. 08501.8332

Dear Judge Hellerstein:

This firm represents the defendants in the referenced matter and writes on behalf of the parties to request a six week adjournment of the pretrial conference scheduled for May 6, 2011.

An initial pretrial conference in this matter was held on January 21, 2011. A second conference initially was scheduled for March 11, 2011, but the Court granted a six week adjournment request, rescheduling the conference for May 6, 2011. At the initial conference, the parties informed the Court that they had begun discussing resolution of this matter. Specifically, prior to the conference the defendants had produced to the plaintiffs' counsel an accounting of the amounts of each of the fifteen plaintiff's potential claims. Since the initial conference, plaintiffs' counsel have conducted a due diligence review of the defendant's voluminous business records and met with each of the plaintiffs to discuss the potential settlement of this matter. The defendants also have responded and are continuing to respond to certain follow up inquiries.

The parties believe they now are at a stage where serious settlement negotiations can begin, and anticipate that they will begin in the next two weeks. In light of these anticipated discussions, the parties respectfully request a second six week adjournment of the pretrial conference, after which they believe that they will have



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resolved this matter or determined whether it can be resolved at this stage of the proceedings.

Please let us know if you have any questions, and thank you for your consideration of this request.

Very truly yours,

A handwritten signature in black ink, appearing to read "J. Patrick Butler". The signature is fluid and cursive, with a large loop at the end.

J. Patrick Butler

cc: Jill Abrams, Esq.  
Jeremy Nash, Esq.